# UNITED STATES ENVIRONEMNTAL PROTECTION AGENCY
# REGION II

DATE: 15 December 2005

TO: File

FROM: Dilshad J. Perera, On-Scene Coordinator

SUBJECT: Draining and Winterizing Westwood Site Sprinkler System

This memorandum provides an update and summary of the status of the fire sprinkler system at the Westwood Chemical Corporation site. At the conclusion of EPA's on-site activities, because EPA would no longer be paying to heat the facility, and because the bankruptcy trustee told me that he could not pay to heat the facility, my intention was to have the sprinkler lines turned off and have the residual water in the lines drained in order to avoid water damage to the facility and damage to the sprinkler system that could occur if the water in the sprinkler lines were to freeze during the cold winter months.

On the week of November 14, 2005, at my direction, the ERRS contractor (Earth Tech) turned off the water supply to the facility at the main valve before the water meter and drained the waterlines by opening all taps and eye-wash stations; they are all in the open position. Furthermore, air was pumped into the lines to force out the residual water. At the time, I did not realize that the sprinkler system was independent of the domestic water supply. When I realized the sprinkler system was still fully charged, I requested that Earth Tech drain/winterize the sprinkler system.

Earth Tech determined that this service may legally only be provided by licensed sprinkler system contractors; hence, Earth Tech issued a Request For Proposal for the draining/winterizing of the sprinkler system. Although several firms responded to Earth Tech for further information, only one potential bidder, Sullivan Fire Protection Corporation, followed through by coming to the Westwood facility to view the actual conditions.

On December 14, 2005, I met at the site with representatives of Sullivan Fire Protection Corporation, the potential vendor for the draining (winterizing) of the sprinkler system at the Westwood Chemical Corporation site. The purpose of the meeting was to give a tour of the site buildings in order for the bidders to more accurately estimate the cost of the specified work. (David Bofinger, Response Manager, Earth Tech, being assigned to a short term project in Puerto Rico, was unable to conduct the tour. Since I had a set of keys to the facility, I provided access to the facility.)

This contractor was familiar with the Westwood Site from prior work while the facility was in operation. The bidder's representative, Dennis Joannides, indicated that due to the extended subfreezing conditions that had already occurred over the last several days, the water in the sprinkler lines in all likelihood is probably already frozen. He attempted to close the primary valve to the sprinkler system; at the point where the waterline to the sprinkler system protrudes from the foundation; he was unable to rotate the valve and suggested that it had already frozen. He said the only way to drain the sprinkler system is to provide heat to the building and maintain warmth for approximately a week. He added the meter room could be heated to allow the contractor to turn off the valve. I told Mr. Joannides that my primary concern was to prevent flooding from ruptured sprinkler lines. Mr. Joannides' advice, based on the current conditions, was to have the water turned off at the street by Town Of Wallkill Water and Sewer Authority. In his opinion, there is approximately 2,000 gallons of water in the sprinkler lines and if there were a failure in the lines, the approximate 2,000 gallons would not drain in one location but rather in multiple locations.

Since the work was to be subcontracted by EPA contractor Earth Tech; I called Mr. Bofinger and had Mr. Joannides' relate our conversation.

At approximately 1:30PM, a technician from the Town water authority turned off the valve on Enterprise Place; after which he stopped by at the site. He indicated that there may still be a waterline from Tower Drive to the facility. At the time of establishment of the Westwood Chemical Corporation on Tower Drive, Enterprise Place did not exist and the water supply would likely have been serviced from a connection on Tower Drive. This stands to reason since a historical photograph found on site predated the construction of Enterprise Place. The technician indicated that if the line was still in service, a water meter would be attached. I told him that there is only one water meter. He added that though in all likelihood the line is not in service; he could not rule out the possibility that the line may still contain water; however, he confirmed that the waterline is below the frost line and as such is not likely to rupture. The most likely place for freezing to occur is at the point the line protrudes through the foundation into the plant.

It is my recommendation that we do nothing further as it relates to the sprinkler system; since, in addition to the high cost of providing heat it would, in my judgment, be unsafe to operate the heating units at the facility unless someone were to be present at the site to monitor the heating units. Also, a faint order of mercaptans was noted at the rear of the building indicating the potential for a minor gas leak. This line which is private and is not part of Orange and Rockland Utilities has been shut off. In order for the gas to be turned back on the leak must first be repaired and so the gas system serving the site could not be used to heat the building.

The sprinkler contractor will provide a cost estimate to drain the sprinkler lines in the office/laboratory area. This may be somewhat ineffectual since the point of origin of the sprinkler line is the midpoint of the production area on the west side and is about 300 linear feet from entering the office/laboratory area. If the cost of the office/laboratory areas is approximately $3,000 or less, it may be practical to drain the sprinkler lines. If on the other hand, the cost is substantially more it may not be worth the expense since the lines feeding these areas reside inside the un-insulated production building. At the present time; a tentative remobilization is scheduled for January 17, 2006 to adjust the soil pH in the areas devoid of vegetation. At that time consideration will be made as to whether sprinkler draining in the office/laboratory areas should take place.

As a final note, the representative of Sullivan Fire Protection Corp. estimated that, should a full draining of the sprinkler system take place, the cost of later turning on and recertifying the sprinkler system would be approximately $10,000 - $12,000; assuming that there had been no damage to the sprinkler system itself.